

BURKE VULLO REILLY ROBERTS

ATTORNEYS AT LAW

1460 Wyoming Avenue
Forty Fort, PA 18704
Phone (570) 288-6441 + Fax (570) 288-4598

*Formerly Burke & Burke
Thomas F. Burke, Sr. (1932-1972)
www.bvrrlaw.com*

JOSEPH L. VULLO
jvullo@bvrrlaw.com

July 24, 2026

E-FILED

Matthew L. Homsher, Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
400 North Street
Harrisburg, PA 17120

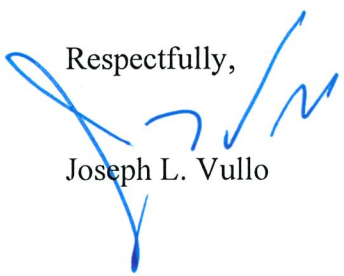
Re: Joint Application of UGI Utilities, Inc. and Argo Infrastructure Partners LLC for a Certificate of Public Convenience Under Chapter 11 of the Public Utility Code and All Other Necessary Approvals (I) for the Conversion of UGI Utilities, Inc. to UGI Utilities, LLC, (II) to Effect a Division of the Assets and Liabilities of UGI Utilities, LLC, (III) to Establish a New Entity to Own and Operate the Assets of UGI Utilities, LLC – Electric Division and Provide Retail Electric Service as a Public Utility, (IV) for the Sale and Transfer of the Membership Purchase Interests in the New Entity to a New Limited Liability Company to be Formed, Owned and Controlled by an Affiliate of Argo Infrastructure Partners LLC, and (V) for the Cessation and Abandonment of Any and All Retail Electric Service in Pennsylvania for UGI Utilities, Inc. / Docket Nos. A-2026-3063610, A-2026-3063612, and A-2026-3063614

Dear Secretary Homsher:

Enclosed for filing please find the Petition to Intervene on behalf of the Commission on Economic Opportunity. Copies are being served on all parties of record per the Certificate of Service.

If you have any questions, please do not hesitate to contact me.

Respectfully,


Joseph L. Vullo

JLV/ma
Enclosures
cc. Parties of Record

**BEFORE THE
PENNSYLVANIA PUBLIC UTILITY COMMISSION**

Joint Application of UGI Utilities, Inc.	:	
and Argo Infrastructure Partners LLC	:	
for a Certificate of Public Convenience	:	
Under Chapter 11 of the Public Utility	:	Docket Nos. A-2026-3063610
Code and All Other Necessary Approvals	:	A-2026-3063612
(I) for the Conversion of UGI Utilities,	:	A-2026-3063614
Inc. to UGI Utilities, LLC, (II) to Effect	:	
a Division of the Assets and Liabilities	:	
of UGI Utilities, LLC, (III) to Establish	:	
a New Entity to Own and Operate the	:	
Assets of UGI Utilities, LLC – Electric	:	
Division and Provide Retail Electric	:	
Service as a Public Utility, (IV) for the	:	
Sale and Transfer of the Membership	:	
Purchase Interests in the New Entity to	:	
a New Limited Liability Company to be	:	
Formed, Owned and Controlled by an	:	
Affiliate of Argo Infrastructure Partners	:	
LLC, and (V) for the Cessation and	:	
Abandonment of Any and All Retail	:	
Electric Service in Pennsylvania for	:	
UGI Utilities, Inc.	:	

PETITION TO INTERVENE

NOW COMES, the Commission on Economic Opportunity (CEO), by and through counsel, Joseph L. Vullo, Esquire, and petitions to intervene in the above-captioned matter averring as follows:

1. The Petitioner, Commission on Economic Opportunity, is a not-for-profit corporation organized and existing under the laws of the Commonwealth of Pennsylvania with its principal office located at 165 Amber Lane, P.O. Box 1127, Wilkes-Barre, Luzerne County, Pennsylvania, 18703-1127. CEO's telephone number is (570) 826-0510.

2. CEO is an advocate for its clients - the low-income population of Luzerne County - and has been directly involved in assuring that low-income persons' utility costs are contained through counseling, advice, payment assistance and energy conservation measures.

3. CEO seeks permission to intervene in the pending application above captioned.

4. UGI Electric Division serves customers in numerous counties including Luzerne County.

5. CEO is the administrator in Luzerne County of a number of UGI Electric's universal service programs.

6. CEO seeks permission to intervene in the pending application to, in large part, address to effect of the proposed transaction on UGI Electric Division's low-income customers and its universal service programs, which serve low-income customers.

6. CEO's participation as an active party in this proceeding is required to protect its substantial interests and the substantial interests of the low-income citizens it represents in ensuring that utility rates remain affordable for its clients and to ensure that its low-income programs remain adequately funded and available. Accordingly, CEO's participation in this proceeding will serve the public interest.

7. Because CEO represents low-income citizens in Luzerne County, the interests of its clients are not being protected by any other party to this action.

8. CEO was granted intervenor status in many proceedings before the Commission, including UGI Electric's pending rate request proceeding filed to docket no. R-2025-3059430.

POSITIONS

9. CEO reserves the right to set forth its position on the transaction but CEO's main purpose is to address to effect of the proposed transaction on UGI Electric Division's low-income customers and its universal service programs, which serve low-income customers..

10. CEO would also address whether the proposed transaction is in the public interest.

REQUEST FOR RELIEF

WHEREFORE, the Commission on Economic Opportunity respectfully requests that the Commission:

1. Receive for filing and docket this Petition to Intervene in order that CEO be a party to such proceedings and be placed on all service lists.

2. Grant to CEO active party status with the right to participate in all proceedings relative to this matter.

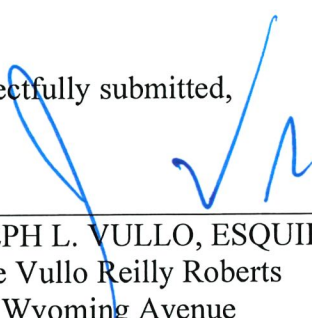
3. Order that the following be designated as CEO's recipients for service:

Joseph L. Vullo, Esquire
1460 Wyoming Avenue
Forty Fort, PA 18704
Phone: (570) 288-6441
Fax: (570) 288-4598
e-mail: jlvullo@bvrrlaw.com

4. Order that each party to the proceedings provide CEO's designated recipients with copies of all papers filed.

5. Grant such other relief as the Commission may deem necessary and proper.

Respectfully submitted,

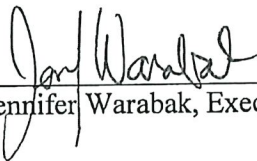


JOSEPH L. VULLO, ESQUIRE
Burke Vullo Reilly Roberts
1460 Wyoming Avenue
Forty Fort, PA 18704
(570) 288-6441
e-mail: jlvullo@bvrrlaw.com

VERIFICATION

I, Jennifer Warabak, Executive Director of Commission on Economic Opportunity, hereby verify that I am authorized to execute this Verification and that the facts set forth in the foregoing Petition to Intervene are true and correct to the best of my knowledge, information and belief.

COMMISSION ON ECONOMIC
OPPORTUNITY



Jennifer Warabak, Executive Director

Dated:

7/24/26

CERTIFICATE OF SERVICE

The undersigned certified that he served a copy of the foregoing Petition to Intervene upon the following participants by electronic mail on the 24th day of July 2026:

The Honorable Charles E. Rainey, Jr.
Chief Administrative Law Judge
Pennsylvania Public Utility Commission
400 North Street
Commonwealth Keystone Building
Harrisburg, PA 17120
crainey@pa.gov

Allison Kaster, Esquire
Director
Bureau of Investigation & Enforcement
400 North Street
Commonwealth Keystone Building
Harrisburg, PA 17120
akaster@pa.gov

Darryl Lawrence, Esquire
Consumer Advocate
PA Office of Consumer Advocate
Forum Place
555 Walnut Street, 5th Floor
Harrisburg, PA 17101
ra-oca@paoca.org

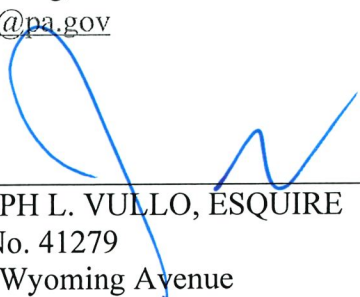
Michael S. Swerling, Esquire
UGI Corporation
500 North Gulph Road
King of Prussia, PA 19406
swerlingM@ugicorp.com

David B. MacGregor, Esquire
Post & Schell, P.C.
17 North Second Street, 12th Floor
Harrisburg, PA 17101
dmacgregor@postschell.com
glent@postschell.com

Devin T. Ryan, Esquire
Post & Schell, P.C.
One Oxford Centre
301 Grant Street, Suite 3010
Pittsburgh, PA 15219
dryan@postschell.com

Alan M. Seltzer, Esquire
John F. Povilaitis, Esquire
Buchanan Ingersoll & Rooney PC
409 North Second Street, Suite 500
Harrisburg, PA 17101
alan.seltzer@bipc.com
john.povilaitis@bipc.com

Steven C. Gray, Esq.
Senior Attorney
Assistant Small Business Advocate
Office of Small Business Advocate
Forum Place
555 Walnut Street, 1st Floor
Harrisburg, PA 17101
sgray@pa.gov



JOSEPH L. VULLO, ESQUIRE
I.D. No. 41279
1460 Wyoming Avenue
Forty Fort, PA 18704
(570) 288-6441
e-mail: jlvullo@bvrllaw.com